

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

AMERICAN ASSOCIATIONS OF  
UNIVERSITY PROFESSORS, ET AL.,

*Plaintiffs,*

v.

MARCO RUBIO, in his official capacity as  
Secretary of State, and the DEPARTMENT OF  
STATE, ET AL.,

*Defendants.*

No. 1:25-cv-10685-WGY

**DEFENDANTS' UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO  
RESPOND TO PLAINTIFFS' MOTION FOR REMEDIES**

Defendants, by and through their counsel, respectfully move this Court to extend the time to respond to Plaintiffs' Motion for Remedies Against Defendants. *See* Motion, November 10, 2025, Dkt. # 277. Pursuant to 1st Cir. R. 7.1(b)(2), Defendants' response to Plaintiffs' Motion for Remedies is currently due by Monday, November 24, 2025. Plaintiffs' motion was filed during the recent lapse in appropriations, during which Department of Justice attorneys and some employees of the Defendant agencies were prohibited from working, even on a voluntary basis, except in very limited circumstances. Appropriations were restored at the end of the day on November 12, 2025. Now that the government has reopened, the Defendant agencies and their counsel are contending with multiple deadlines that have been activated concurrently upon that reopening. As a result of the time lost due to the lapse in appropriations and subsequent reopening-related demands, and in light of the upcoming Thanksgiving holiday disruption, Defendants respectfully request an additional 9 business days, until December 5, 2025, in which to submit their response. Counsel for Plaintiffs have indicated that they do not oppose this extension request.

Respectfully Submitted,

BRETT A. SHUMATE  
*Assistant Attorney General*

DREW C. ENSIGN  
*Deputy Assistant Attorney General*

Ethan B. Kanter  
ETHAN B. KANTER  
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PAUL F. STONE  
*Deputy Chief, National Security Unit*  
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WILLIAM G. KANELIS  
*Civil Division*

*Dated: November 18, 2025*

*Counsel for Defendants*

**L.R. 7.1(a)(2) CERTIFICATION**

I, Ethan B. Kanter, hereby certify that Government counsel conferred with Plaintiffs' counsel regarding this motion by email on November 17 & 18, 2025.

*Date: November 18, 2025*

By: /s/ Ethan B. Kanter  
ETHAN B. KANTER  
U.S. Department of Justice

**CERTIFICATE OF SERVICE**

I, Ethan B. Kanter, hereby certify that on November 18, 2025, I served this document upon all registered parties via the ECF Notice of Electronic Filing (NEF) system.

*Date: November 18, 2025*

By: /s/ Ethan B. Kanter  
ETHAN B. KANTER  
U.S. Department of Justice